

Comments on AEP's Mitchell Plant

EPA HQ - None

EPA Region - None

State - None

Company - See attached document dated November 23, 2009.



Comments on Draft Dam Assessment Report - Mitchell

- November 23, 2009 -

American Electric Power has reviewed the draft assessment report for the Mitchell Plant bottom ash complex and Conner Run dam prepared by Paul C. Rizzo Associates. We have the following comments on that report:

Section 1.1 – Mitchell Plant is not owned and operated by “American Electric Power Service Corporation”. The Service Corporation does not own or operate facilities. The correct reference should be to Ohio Power Company, a subsidiary of American Electric Power, Inc.

Section 1.1 – The second paragraph states that “(u)nder normal operating conditions, byproducts of coal combustion, including fly ash, bottom ash, boiler slag, flue gas emission control residuals, and other general wastewater products, are sluiced to either the Conner Run Dam... or the onsite Bottom Ash Complex.” Please be advised that Mitchell Plant does not produce boiler slag, nor does the plant sluice flue gas emission control residuals (i.e., FGD gypsum) to either impoundment. FGD gypsum is handled in a dry manner, most of which is used by a neighboring company to manufacture wallboard.

Section 1.6.1 (page 5) - Please note that Gary F. Zych should be correctly listed as representing AEP Engineering Services, rather than Environmental Services. is part of Civil Engineering not Environmental Services. We also note that the “Kammer” Plant name is misspelled as “Krammer.”

Section 2.1.1 (page 7) – In the last sentence on this page, the Conner Run impoundment outlet pipe is incorrectly identified as concrete-lined. The pipe is made of welded steel.

Section 2.1.2 (page 9) and **Section 4.3** (page 24) – References to the Pennsylvania Department of Environmental Protection (PADEP) should be removed as that agency has no jurisdiction. These facilities are regulated by the West Virginia Department of Environmental Protection – Division of Water & Waste Management (WVDEP – DWWM).

Section 5 – AEP concurs with all recommendations noted in the draft report.